

EXHIBIT “A”

Mr. Ernie Molina
Warner-Jenkinson Company of California
P.O. Box 16797
Irvine, California 92713

Dear Mr. Molina:

This is in reply to your letter of January 17, 1980 concerning the labeling of vanilla flavoring with other natural flavors.

A flavoring composed of 50% vanilla extract and 50% natural flavors not derived from vanilla beans intended for retail sale may be identified as "vanilla flavor with other natural flavors". However, because "vanilla extract" and "vanilla" flavoring are standardized foods and these products are expensive we believe in order to distinguish this product from other similar products the general principles of 21 CFR FR 102.5 should apply. Thus, the name should be accompanied by "contains 50% vanilla extract and 50% non-vanilla flavors".

Since this product is to be sold at retail it must comply with the applicable labeling requirements of 21 CFR 101. These provisions would require at a minimum that the label for the food bear: (1) an identity statement; (2) an accurate net contents declaration; (3) a listing of each ingredient in the food by its common or usual name in descending order of predominance by weight; and (4) the name and address of the manufacturer, packer or distributor.

If we can be of further assistance, please let us know.

Sincerely yours,

Taylor M. Quinn
Associate Director
for Compliance
Bureau of Foods